

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

JORGE LUIS ESTRADA COREANO  
ELIZABETH COTTO CHINEA

DEBTORS

CASE NO. 18-03557/EAG

CHAPTER 13

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**MOTION REQUESTING CONVERSION TO CHAPTER 7**

**TO THE HONORABLE COURT:**

**COME NOW, JORGE LUIS ESTRADA COREANO and ELIZABETH COTTO CHINEA**, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. Debtors may be a debtor under Chapter 7, 11 U.S.C. §701, et seq.
2. Debtors may convert a case under Chapter 13 to a case under Chapter 7 of Title 11 at any time, 11 U.S.C. §1307(a).
3. There have been no prior case and no prior conversions.
4. The Schedules and Statement of Financial Affairs have been filed in the case and unless the court otherwise orders it shall be deemed filed in the Chapter 7 case, Rule 1019(1)(A), Federal Rules of Bankruptcy Procedure.

**WHEREFORE**, the Debtors respectfully request that this Honorable Court grant this motion, convert this Chapter 13 case to one under Chapter 7 and enter relief pursuant to Chapter 7 of Title 11, United States Code.

**I CERTIFY** that on this same date a copy of this notice was by the Clerk of the Court using CM/ECF systems which will send notifications of such the Chapter 13 Trustee; and also certify that I have mailed by United State Postal Service copy of this motion to the

following non CM/ECF participant Debtors; and to all creditors and parties in interest as per the attached master address list.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 14<sup>th</sup> day of December, 2020.

**/s/ Roberto Figueroa Carrasquillo**  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
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*Certifico haber leído la presente moción y la misma ha sido redactada según mis instrucciones. En Caguas, Puerto Rico hoy 14 de diciembre de 2020.*

**/s/Jorge Luis Estrada Coreano**  
**JORGE LUIS ESTRADA COREANO**

**/s/Elizabeth Cotto Chinea**  
**ELIZABETH COTTO CHINEA**

Label Matrix for local noticing  
0104-3  
Case 18-03557-EAG13  
District of Puerto Rico  
Old San Juan  
Mon Dec 14 13:06:29 AST 2020

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BANKRUPTCY SECTION 424 B  
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LVNV Funding, LLC its successors and assigns  
assignee of Citibank, N.A.  
Resurgent Capital Services  
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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End of Label Matrix	
Mailable recipients	40
Bypassed recipients	0
Total	40